



U.S. Department
of Transportation

**Federal Highway
Administration**

Office of the Administrator

400 Seventh St., S.W.
Washington, D.C. 20590

August 30, 1996

Refer to: HEP-40

Mr. Michael L. Davis
Deputy Assistant Secretary for Civil Works
Department of the Army
Washington, DC 20310-0108

Dear Mr. Davis:

The Federal Highway Administration (FHWA) continues to support the United States Army Corps of Engineers in the development and implementation of a regionalized functional wetlands assessment methodology for the evaluation of wetlands as required under the public interest review procedures of the Section 404 permit program. State highway agencies continue to have a need for an effective, consistent, scientifically sound approach to wetlands assessment to evaluate wetlands impacts under the requirements of National Environmental Policy Act (NEPA) as well as Section 404 permit applications. The proposed Hydrogeomorphic (HGM) approach to wetlands assessment appears capable of addressing these needs, and will facilitate the merger of the NEPA and Section 404 processes.

The HGM National Implementation Plan states several objectives and applications. The overall objective of the implementation plan is stated as the use of the HGM approach to assess wetlands impacts for 80 percent of the individual Section 404 permit applications. In developing the necessary functional models and required databases, riverine and depressional wetland types have been given top priority. We concur with these objectives.

We therefore support expedited development and implementation of the HGM approach as the national methodology for assessment of wetlands impacts under Section 404 requirements to best protect wetland resources and facilitate project decisions. In this light we believe the following needs and concepts should be emphasized:

1. The regional HGM wetland models should not require assessment of those ecological functions not being performed by the wetland type being evaluated, or those that are not of importance in the local watershed context. This will reduce the number of field indicators and calculations needed for individual functional assessments.

2. The number of field characteristics or parameters for each function should be the minimum consistent with a scientifically based evaluation. Extra variables will only add time requirements to the assessment without adding accuracy or reliability.
3. The number of regional wetland HGM types should be the minimum consistent with scientific accuracy and regional geography. Extraneous models will only increase training requirements and confusion without adding value to the procedure. The Waterways Experiment Station should be the lead agency in determining practical geographical boundaries for the development of functional wetlands models, and should maintain close oversight on the number of regional types identified. This will reduce cost and save time.
4. Consideration should be given to developing two levels of models - one for the "ordinary" individual permit, and another for Special Area Management Plans, or Advanced Identification Programs. This will allow the widest application of the HGM technique and maintain a consistent data base for different applications.
5. A national HGM database should be established to maintain records and datasets on reference wetlands that are used to develop the functional models. That way, consistent revisions of the functional models will be possible as new information is available, or as conditions change. Reference data should be available to other agencies, the public, and academic institutions for research and development of new applications.
6. The Waterways Experiment Station should remain the leader and coordinator of the National HGM Training and Implementation Effort, with technical and funding support from other concerned Federal Agencies. The FHWA will continue to provide both technical and funding support toward development of the methodology and training effort.
7. The HGM applications for the National Wetlands Inventory should be pursued to evaluate progress toward a no-net-loss national goal.
8. Public involvement should be emphasized throughout the national implementation effort. Public support and involvement will add immeasurably to the effectiveness and acceptance of the effort.

9. The Center for Transportation and Environment, North Carolina State University is prepared to host a joint teleconference on the status of HGM implementation in January or February of 1997. We think this would be a very valuable contribution to getting input from State transportation agencies and other potential users of HGM, and to advancing the implementation effort.

We appreciate your consideration of these recommendations, and again state our support of the national implementation of the HGM approach in the Section 404 permit program. For further information, please contact Paul Garrett of our Environmental Analysis Division at (202) 366-2067.

Sincerely yours,



Anthony R. Kane
Executive Director

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